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Liability of Landlord for Failure to Repair.—*Graff v. Wm. J. Lemp Brewing Co.* Kansas City Court of Appeals, Missouri, July 9, 1910. 129 S. W. 1005. A promise by a landlord to repair defects in the premises, so dangerous as to constitute a constant menace to the personal safety of the tenant, made at the time of the letting, with knowledge of the defects, creates a duty, the negligent breach of which by the landlord is a tort, and the tenant may sue in tort for a personal injury sustained in consequence of the defects.—*Central Law Journal.*

Alienation of Love and Affections.—That the giving of advice and instructions by parents of a husband to their daughter-in-law does not always promote welfare and happiness is brought out in the case of *Heisler v. Heisler*, 127 Northwestern Reporter, 823. The action is brought by the wife against her husband's parents for alienating her husband's love and affections. Plaintiff was a telephone operator and a city-bred girl when she met her future husband, who was a Dutch farmer boy named Willie. In the course of time, after the necessary preliminaries, they were married, and the young wife was brought home to live with the "old folks." Unhappily, however, the "folks" were-unpleased with their boy's choice and the fight began. Father would have liked it better if Willie had married a "big Dutch girl" who could have worked in the fields and husked corn, and worst of all she couldn't make good sauerkraut. Mother didn't like her cooking, found fault with the new arrangement of the furniture, with her raising too many chickens, and with her foolish counsel to Willie in the operation of the farm. Neither of the "folks" extended any sympathy or encouragement to their daughter-in-law, but, on the contrary, were always inclined to criticise. The result of all this was that Willie gradually began to think that he had made a poor "pick" in choosing a mate. He began to dislike her, soon hated her, and his heart so hardened that on one occasion he cruelly beat her, whereupon she left them all, presumably to "go home to mother." She brought an action for divorce, which was granted, and then brought this action against the parents of her divorced husband to recover damages for alienating her Willie's love. The Supreme Court of Iowa holds that parents by reason of their natural obligation to their child may counsel him as to his welfare and that of his wife, providing that they do not act maliciously. As to the charge against the father in condemning the sauerkraut the court said: "The kraut may have been indigestible, but we never heard that discussions of the quality of kraut necessarily have a bearing on the state of the affections." The court decided that no liability could be attached to him, but as to the mother the evidence showed she had deliberately undermined Willie's affections for his wife. The lower court allowed \$7,000 damages, but the Supreme Court held the verdict excessive, reducing it to \$2,000. As to damages, in concluding, the court said: "It does not